

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

Trevor Davis,

File No. 21-cv-565-wmc

Plaintiff,

v.

**PLAINTIFF'S PROPOSED
ADDITIONAL VOIR DIRE**

Christopher Allen, in His Individual
and Official Capacities,

Defendant.

TO: UNITED STATES DISTRICT COURT, WESTERN DISTRICT OF WISCONSIN.

DEFENDANT CHRISTOPHER ALLEN, AND HIS ATTORNEYS ANDREW A.
JONES AND JAMES F. CIRINCIONE, HANSEN REYNOLDS LLC, 301 N.
BROADWAY, SUITE 400, MILWAUKEE, WI 53202.

Plaintiff Trevor Davis, through his undersigned counsel, respectfully requests the
Court supplement its standard voir dire standard questions with the following lines of voir
dire inquiry:

1. Are you or anyone close to you employed by or otherwise associated with Wisconsin County Mutual Insurance Corporation?
2. Are you or anyone close to you insured by Wisconsin County Mutual Insurance Corporation, or do you or they work for an employer insured by Wisconsin County Mutual Insurance Corporation?
3. Are you or anyone close to you employed by or otherwise associated with Barron County or the Barron County Sheriff's Department?
4. Are you or anyone close to you employed by or otherwise associated with any other governmental entity or law enforcement agency?
5. Identify all social media accounts that you have used actively at any time during the past five years.
6. Have you or anyone close to you ever sustained injuries as a result of a dog bite or as a result of the use of force by a police officer?

7. Have you ever contributed to a GoFundMe or other fundraising effort to help either a police officer injured in the line of duty or an individual injured by a police officer?
8. Have you or anyone close to you ever had an interaction with law enforcement that gave you a positive or negative view of law enforcement generally? Do you otherwise have either a positive or negative view of law enforcement – if so, why?
9. Have you ever been arrested, handcuffed, or taken to jail?
10. Has a police officer ever used physical force against you?
11. Have you or anyone close to you ever received a settlement or judgment for a personal injury claim?
12. Has anyone ever made a personal injury or other legal claim against you or anyone close to you?
13. The plaintiff in this case alleges that he was injured and sustained associated damages defined under the law. He is seeking monetary compensation for those damages. One category of damages he is claiming is commonly referred to as 'general damages', and it includes non-economic losses like pain and suffering, emotional distress, disability, and disfigurement, which do not come with a specific dollar value like, for example, medical expenses would. How do you feel about the idea of potentially deliberating about and assigning a fair monetary value to these claimed non-economic damages?

Respectfully submitted,

MESHBESHER & ASSOCIATES, P.A.

Dated: 4/21/2023

s/ Richard E. Student
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